

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Llewellyn Angelo Williams
22 Clinton Ave New Rochelle N.Y. 10801

Amended

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

under the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)

-against-

The city of New Rochelle
515 North Ave
New Rochelle N.Y. 10801

Jury Trial: ☐ Yes ☒ No
(check one)

13 CV 3315

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Llewellyn Angelo Williams
ID # _____
Current Institution 22 Clinton Ave
Address New Rochelle N.Y. 10801
Angelow0007@Gmail.Com

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name City of New Rochelle Shield # _____
Where Currently Employed 515 North Ave
Address New Rochelle N.Y. 10801

Defendant No. 2 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

Defendant No. 3 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

Defendant No. 4 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

Defendant No. 5 Name _____ Shield # _____
 Where Currently Employed _____
 Address _____

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

They Violated my Fair and equitable Affirmative Action within Contract Law.

B. Where in the institution did the events giving rise to your claim(s) occur?

The City of New Rochelle at McDonalds Restaurant on North Avenue, Key bank formerly known as Union State bank. And I was falsely imprisoned after being intimidated by police.

C. What date and approximate time did the events giving rise to your claim(s) occur?

Between 2009-2013 I wasn't notified by the City of New Rochelle to participate in obtaining A business Contract

For Towing and booting within the city of New Rochelle, New Rochelle has allowed Safeway Towing company to Dominate and monopolize the Towing and booting for approximately thirty (35) years. Being an African American business man, this is clearly a Civil Rights Violation concerning unfair Trade practices, Monopolization, Discrimination. This is how the Safeway Towing company has kept the contract advantage for (35) thirty-five years. Furthermore, this is a violation of my Affirmative Action guarantees. Safeway Towing corporation has had an absolute advantage over my ability to willingly participate in my entitled usage of fair Trade, to which the rules are being violated concerning unfair Trade practices. I've therefore, been restrained from developing my business Capitalization. I personally feel that they targeted me to run me out of business. by tactic of harassment Discrimination, by writing bogus city codes, False arrest, that tied me up in court for years. These allegations concerning Harassment are attached hereto from a previous court matter pertaining to the city of New Rochelle.

D. Facts: my constitutional rights and my civil rights were violated because I am an African American business owner who was intimidated and physically assaulted to restrain my ability from being productive member of the local business community based upon the law of the common law of contracts. I feel that I'm currently still a disenfranchised member of the business dynamic. I feel that their behavior shouldn't be tolerated under any circumstances. Based on their anti social and race based statements that were used against me, my affirmative action guarantees were violated. And furthermore, my 9th and 14th amendment rights guarantees have been infringed upon. I conclude by asking this Court for a total compensation based on a civil tort. Therefore, seeking an award damage of no less than \$20,000,000 Dollars.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Emotional Trauma based on the continuity of Harassment and Discrimination. This was a clear case of defamation of character. Furthermore, this is a matter of misrepresentation of the facts, these are clear instances of civil tort

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ☐ No ☒

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

New Rochelle City Jail and
the valhalla county Jail.

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ☐ No ☐ Do Not Know ☒

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ☐ No ☐ Do Not Know ☐

If YES, which claim(s)? _____

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ☐ No ☒

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ☐ No ☒

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

In the court of Law

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process. _____

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here: _____

2. If you did not file a grievance but informed any officials of your claim, state who you informed, _____

when and how, and their response, if any: _____

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. _____

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). Based upon the Aforementioned testimony that I have prepared for the Court I again am asking for no less than 20,000,000 dollars. my Affirmative Action guarantees were violated in accordance to executive order 11246, mandated in 1965. Furthermore, my compliance with my fair right to a fair bidding process was taken away from me and from the language of the Office of Federal Contract Compliance of C.S.P. Gov. These problems have persisted in the cities of Port Chester and New Rochelle since 2003 to the present day. The concept of price fixing and price discrimination was violated.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes _____ No ☒

On
these
claims

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ____ No ____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

On
other
claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes ____ No ☒

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ____ No ____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3 day of June, 2013.

Signature of Plaintiff _____
Inmate Number _____
Institution Address _____

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 3 day of June, 2013 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: *Shellyn Angelo Williams*